

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

GREGORY COLBURN, et al.,

Defendants.

Cr. No. 19-10080-NMG

DEFENDANTS' PROPOSED ALTERNATE VERDICT FORM

Defendants respectfully object to the Verdict Form as drafted with respect to Count One because they believe it could confuse the jury. Defendants propose the following modification to the verdict form with respect to Count One:

WE, THE JURY, UNANIMOUSLY FIND:

1. The defendant under consideration on the charge of conspiracy to commit mail and wire fraud and honest services mail and wire fraud (Count One):

	NOT GUILTY	GUILTY
Gamal Abdelaziz	_____	_____
John Wilson	_____	_____

If you find either of the defendants guilty on Count One, check each of the following upon which you based your verdict for each defendant whom you found guilty:

- a. Conspiracy to Commit Mail Fraud

Gamal Abdelaziz _____

John Wilson _____

- b. Conspiracy to Commit Wire Fraud

Gamal Abdelaziz _____

John Wilson _____

c. Conspiracy to Commit Honest Services Mail Fraud

Gamal Abdelaziz _____

John Wilson _____

d. Conspiracy to Commit Honest Services Wire Fraud

Gamal Abdelaziz _____

John Wilson _____

Dated: October 6, 2021

Respectfully submitted,

GAMAL ABDELAZIZ

By his attorneys,

/s/ Brian T. Kelly

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed electronically on October 6, 2021, and thereby delivered by electronic means to all registered participants as identified on the Notice of Electronic Filing.

/s/ Brian T. Kelly
Brian T. Kelly